

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE:

ANGELA ANESSA JAMERSON

Case No. 1:17-bk-02721-HWV

Chapter 13

ANGELA ANESSA JAMERSON,

Movant

vs.

Nationstar Mortgage LLC D/B/A Mr. Cooper,
Respondent

**CONDITIONAL NON-OPPOSITIONAL RESPONSE TO MOTION TO SELL
REAL ESTATE**

COMES NOW, National Mortgage LLC D/B/A Mr. Cooper, (herein, “Respondent”) by and through undersigned counsel, and hereby responds to the Motion to Sell Sell Real Estate [Doc. 76] filed on March 28, 2022 and in support thereof, shows unto the Court as follows:

1. Admitted.
2. Admitted.
3. Admitted according to the Sales Agreement provided.
4. Admitted in part and denied in part. It is admitted that the Sales Agreement which is attached to the Instant Motion lists the sale price of \$420,000.00. Debtor provides no proof that \$420,000.00 constitutes a fair and reasonable consideration. Strict proof to the contrary is demanded at trial.

5. Admitted. By way of further answer, it is admitted only that National Mortgage LLC D/B/A Mr. Cooper has a secured lien on the property. A Payoff will be provided to Debtor’s

counsel as soon as it is available.

6. Respondent objects to any Order permitting sale of the property without the following:

- a. Respondent's lien is paid in full from the closing proceeds, pursuant to a proper payoff quote obtained prior to and good through the closing date; or
- b. Any short payoff is approved by Respondent; and
- c. Debtor shall have ninety (90) days from entry of the Order to sell the Real Property.

WHEREFORE, Respondent respectfully requests that any order permitting the sale of Real Estate condition the same upon the conditions set forth above and for any other relief the Court deems just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

8757 Red Oak Boulevard, Suite 150

Charlotte, NC 28217

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE: ANGELA ANESSA JAMERSON	Case No. 1:17-bk-02721-HWV Chapter 13
ANGELA ANESSA JAMERSON, Movant	
vs.	
Nationstar Mortgage LLC D/B/A Mr. Cooper, Respondent	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the Response to Debtor's Motion to Sell Real Estate has been electronically served or mailed, postage prepaid on this day to the following:

ANGELA ANESSA JAMERSON
154 SPRING MEADOWS RD
MANCHESTER, PA 17345-9488

Kara Katherine Gendron, Debtor's Attorney
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
mottgendronecf@gmail.com

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Asst. U.S. Trustee , US Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

April 5, 2022

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

8757 Red Oak Boulevard, Suite 150

Charlotte, NC 28217

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com